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9:58 am Feb 08 2018

**Clerk U.S. District Court
Northern District of Ohio
Toledo**

AFFIDAVIT

Stephen Snyder, hereinafter "Affiant," being first duly sworn, states and deposes as follows:

1. I am a Special Agent with the United States Secret Service, and am authorized to conduct criminal investigations on behalf of the Secret Service. I have been employed as a Special Agent with the United States Secret Service since 2002, and am currently assigned to the Toledo Resident Agency of the U.S. Secret Service's Cleveland Field Office. Prior to Toledo, I was assigned to the New York Field Office. I completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, and the U.S. Secret Service Special Agent Training Course in Beltsville, Maryland, where my studies have included several investigative courses specifically dealing with wire fraud and access device fraud. As a Special Agent, I have participated in numerous criminal investigations involving access device fraud, wire fraud, identity theft, and false identification documents.

2. I am familiar with the information contained in this affidavit based on my own personal participation in the investigation, my review of documents and evidence, and conversations I have had with other law enforcement agents and other individuals. Because this affidavit is submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included herein the details of every aspect of the investigation.

3. Based upon the information set forth in this affidavit, your Affiant respectfully submits that there is probable cause to believe that MARK SIMON has committed the following federal criminal offenses: (1) knowingly and without lawful authority, producing one or more identification documents, authentication features and false identification documents in violation of Title 18, U.S.C., Section 1028(a)(1); (2) knowingly transferring one or more identification

documents, authentication features and false identification documents knowing that such document or feature was stolen or produced without lawful authority, in violation of Title 18, U.S.C., Section 1028(a)(2); (3) knowingly produce, transfer and possess a document-making implement and authentication feature with the intent such document-making implement and authentication feature will be used in the production of a false identification document or another document-making implement and authentication feature which will be so used, in violation of Title 18, U.S.C., Section 1028(a)(5).

DIGITAL ENVIRONMENT BACKGROUND / DEFINITIONS

4. Cryptocurrencies / virtual currencies are digitally exchangeable mediums, which are based upon cryptography and the use of keys to produce, trade and document transactions of a virtual currency denomination. The virtual currency is not tied to any standard and has its value implied by their market and those trading the currency. There is also no centralized controlling entity; instead, all transactions are kept in a publically viewable database.

5. Bitcoin is one type of cryptocurrency present in the global virtual currency markets. Bitcoin uses a “virtual wallet” to store funds which consists of a private key that the owner’s Bitcoin is associated with on the network. The private key is made up of alphanumeric characters and represents the wallet. Cryptographic algorithms are then used with the private key to derive public keys. These public keys are then utilized by users of the Bitcoin network to exchange Bitcoins with each other. When one sends Bitcoin to a public key, the network then associates ownership of Bitcoin back to the private key that generated the public key. That private key becomes the information that it required to possess the Bitcoin associated with it. When transactions occur on the Bitcoin network between public keys, they are entered into the

blockchain. The blockchain, also commonly referred to by some as the ledger, is where cryptography is used in conjunction with the keys exchanging Bitcoin to provide proof that a transaction took place and to prove Bitcoin ownership. The blockchain continues to get larger as an accountant's ledger would with each transaction and the cryptographic solutions become more difficult and require more processing power and time. The security of Bitcoin is in the fact that the cryptography is based upon the previous blockchain cryptographic solution and new transactions. So it is impossible mathematically to go back in the blockchain and alter previous transactions, because it would not validate and match the current blockchain entry.

6. Reddit is an Internet website community that can be viewed either anonymously or by logging in using a username and password. The website is a blog site where individuals or groups can exchange or submit information and news about information or services available online. People can then rate these items and therefore Reddit indicates they generate a list based upon popularity by Reddit community member voting. There is no one specific topic on www.reddit.com and the website is searchable.

7. The Onion Router, also referred to as TOR, is freeware that is used to enable anonymous or semi-anonymous Internet traffic. TOR does this by using a network of TOR Internet proxy servers that route Internet traffic through them. When downloaded, installed and properly loaded, the software has the ability to route a user's Internet traffic through the TOR network and mask the Internet connection's true source IP address. An example of this would be a device connected to the Internet properly running TOR is located in the United States, but after having its network traffic run through the TOR network, the device's IP address connection now has a source IP address associated with a device connecting to the Internet in the Netherlands. The purpose of TOR is to protect one's privacy while using the Internet, by anonymizing the

user's Internet connection IP address and not tracking or logging the connections from the actual source to the TOR node IP address. Although by default TOR anonymizes the IP address of the connection, the Internet traffic itself is still visible, unless the connection is encrypted by other means.

PROBABLE CAUSE

8. October 22, 2015, Agent Thomas Dalton of the Ohio Department of Public Safety ("ODPS") received an email regarding fictitious Ohio identification documents. An employee of McMurray's Pub in Springfield, Ohio, submitted a Suspicious Activity Report to Ohio Homeland Security regarding fake ID's collected at the bar. This information was passed on to the ODPS Cincinnati District office. Agent Dalton contacted McMurray's Pub to set up a meeting to get the various fake IDs. ODPS Agent Jason Shawver met with an employee of the Pub on October 22, 2015 and took custody of the fake ID's. Agent Dalton observed that two of the IDs purported to be Ohio driver's licenses.

9. October 27, 2015, Agents Dalton and Shawver contacted a Wittenberg University student to interview him regarding the fake IDs. That student told the Agents that he gave a friend some money and they got the fake ID off the Internet site Reddit.com.

10. On October 28, 2015, Agent Dalton researched the Reddit.com website and found that, according to the comments, there is a person in Ohio who only makes Ohio IDs. A person could purchase a fake Ohio ID by using bitcoins (online Cryptocurrencies) and have the fake ID mailed to them anonymously. Agent Dalton identified the Reddit.com username of the purported seller: TedDanzigSr, which listed the onion website, Teddanzig.nblnrtr.onion.link/index.html, to accept orders for the fictitious Ohio driver's licenses.

Throughout the investigation, ODPS Agents monitored TedDanzigSR on Reddit.com and observed that he posted on a daily basis on subjects related to fictitious IDs.

11. On December 31, 2015, Agent Moyers searched Google for the username TedDanzigSR used on Reddit.com by the manufacturer of the fictitious IDs. In the Google search results, Agent Moyers observed a link to a YouTube video. Agent Moyers clicked on the video and watched a short video demonstrating the quality of an Ohio fictitious identification. The title of the video was “Fake ID by Ted Danzig Presents: New Ohio/Blue” and was published on December 1, 2015. The username of the video was listed as “Ted Danzig”. Agent Moyers viewed the YouTube channel of “Ted Danzig” and observed an additional video entitled “Fake I.D. Ohio by Ted Danzig SR” that was published on August 28, 2013. Agent Moyers watched both videos and at the end of each video was a contact email listed as, danzigohio@gmail.com.

12. Agent Moyers also found a review video of fake IDs on youtube.com. The video showed a person wearing blue rubber gloves and using tweezers to handle the fictitious ID, bending the ID, holding it under a black light to show the holograms, the back of it containing the magnetic strip and the packaging used for shipping, which was an 8.5” x 11” plastic page holding baseball cards in separate pockets. The USPS express shipping package had stamps and the return zip code was Toledo, Ohio 43613.

13. On January 12, 2016, ODPS Agents Dalton and Moyers created a fictitious email and a Bitcoin Wallet on localbitcoins.com in name of Thomas Brewer and ordered a fictitious Ohio driver’s license on the Teddanzig.nblnrtr.onion.link/index.html webpage for .7704 Bitcoin, which equaled \$310.00 (US Currency) at that time. The actual amount or value of Bitcoin fluctuates daily. The actual cost of the ID was \$250 and USPS Express shipping was \$60.00 for

a total of \$310.00. The order placed was order #8798990. Agents had the package shipped to a covert address under a fictitious name.

14. On January 20, 2016, at approximately 11:00 am, Agent Dalton received a package delivered to the covert address in Dayton, OH 45409 in the name of Thomas Brewer. The return address on the parcel was as follows: Lisa Crisman, 4036 Lancelot Road, Toledo, OH 43623, which is not a valid address. However, Agents believe it is not connected to the TedDanzigSR Reddit.com.com username. The stamp on the package cost \$22.95 (US Currency). The contents of the package, one 8.5"x11" plastic page contained ten baseball cards with the fictitious Ohio Driver's License taped between two of the baseball cards. Agents submitted items for latent fingerprint analysis but no prints were recovered.

15. On February 9, 2016, at approximately 10:30AM, Agents Moyers and Dalton met with ODPS Analyst Mason. Agents logged on to the website teddanzignblnrtr.onion to purchase a duplicate identification of the one purchased on January 12, 2016. Agents clicked on the order status tab and entered the previous order number of 8798990. Agents selected the option to purchase a duplicate Identification for \$60 and selected to have the package shipped express. Agents were requested to pay \$110, or 0.2934 in Bitcoins, to BTC address 1BSwAKD7jnFGNGSnW7dTbEwUXs67E88ned for the duplicate fictitious identification. Agents received a new order number of 4229081. Agents logged into a localbitcoin.com account and transferred the requested amount and completed the transaction. Agents designated the package to be shipped at an address at the University of Dayton.

16. On February 12, 2016, Agents obtained a court order to obtain the IP address used by the Reddit.com username, TedDanzigSR. On February 15, 2016, Agents received the duplicate ID; however, it was not shipped using USPS Express shipping as paid for. The

duplicate ID was instead delivered in an off-white (wedding style invitation) envelope. Agents were able to pull a partial fingerprint from the envelope and submitted it to BCI; however, the print did not match any known prints in the AFIS system.

17. On February 19, 2016, Agents Dalton and Moyers met with United States Postal Service Inspector Dan Senchesak in Toledo, Ohio. Agents inquired if the \$20 stamp used on the Express package and the Express package itself could be tracked. Inspector Senchesak stated that the techniques used by the suspect made it impossible to track. Inspector Senchesak further informed Agents that the suspect was using drop boxes to mail the items. Agents and Inspector Senchesak met with a postal carrier and described the unique package, which the suspect had used. The postal carrier stated that he had seen these in random drop boxes all over the Toledo area for years. There are over 300 drop boxes in the Toledo area.

18. On March 3, 2016, Agents received the records from Reddit.com and discovered that the subject used counter measures to hide his actual IP address. After meeting with Cyber Crimes Units for BCI and FBI, Agents requested additional information regarding user agent strings, log-in and log-out information and extension of non-disclosure.

19. In March 2016, Moyers and Dalton learned that in 2008, Assistant Agent in Charge (AAIC) Michael Hakeos had investigated an individual for manufacturing fictitious identification documents in the Toledo area, but did not make an arrest in the case. AAIC Hakeos searched his records and found the name of the suspect, Mark Alex Simon of 4707 Stengel Ave. Toledo, Ohio. AAIC Hakeos sent Simon's name to the Ohio State Highway Patrol's Analysis unit and requested additional information on him. Analysts searched various databases but did not find any current employment for Mark Simon. The Unit did learn that

Simon was educated at the University of Toledo and that he was enrolled in the post doctorate program.

20. On April 26, 2016, Agent Dalton obtained court orders and a search warrant requesting additional log-in information and private messages sent and received in reference to the username TedDanzigSR. On May 13, 2016, Agent Dalton received records from Reddit.com. The documents included hundreds of pages of public and private posts by Teddanzigsr occurring throughout the investigation time period. The following is a summary of the information ODPS received from Reddit.com from numerous court orders and search warrants during the investigation and includes public and private posts. Prior to posting and advertising his illegal activities on Reddit.com, username Teddanzigsr manufactured and sold fictitious identifications on Silk Road and the previous website Teddanzig.com. Silk Road was a dark web marketplace where a variety of illegal items could be purchased. Silk Road was shut down by the Federal Government around 2013. In December 2014, Teddanzigsr started a new website run as a TOR hidden service on the dark web at the Onion site, <http://teddanzignblrntr.onion>. A user is required to have a TOR Browser to access this site. A TOR browser masks an individual's online identity. The fictitious identification documents must be purchased with Bitcoins (BTC). Teddanzigsr created a Reddit.com account on June 18, 2013, and began posting on the fake ID thread <https://www.reddit.com/r/fakeid/>. Teddanzigsr was labeled a "Vendor" on the Reddit.com and had his own thread advertising his fictitious ID business. His thread was extremely detailed and gave instructions on how to purchase his IDs.

21. Reviewing the posts, Agent Moyers observed Teddanzigsr used the term "OPSEC" on a frequent basis. "OPSEC" is defined as operational security. Teddanzigsr described "tumbling deliveries" where he would have a shipment or package delivered to a third

party's residence before getting to his possession. Agent Moyers observed conversations between other vendors and TedDanzigSR stating that it was common to wear gloves during the production of fictitious identification documents to not leave fingerprints and to prevent detection from authorities. TedDanzigSR stated in a post that he lives a lower income life style and mostly wears "wife beater" shirts and jeans and stays "low key." He stated many times he lived in Ohio and his website previously stated they were located in Ohio. He used a "heat / pressure" treatment during the production of the fictitious identifications. He stated that only 10% of his manufactured identifications stay in Ohio with the rest being shipped nationwide. There were also numerous private and public posts about being cautious when shipping items through the United States Postal Service and techniques to elude detection from authorities.

22. Listed below are examples of some of the private and public statements made by TeddanzigSR on Reddit.com.

Private message between TedDanzigSR and Vendor "Zabud" dated February 29, 2016 listing the subject as, "OPSEC". TedDanzigSR wrote:

"I'm a big worrier too, I don't go over this publicly, but I actually stopped making these a while ago. I handle the "digital" aspect of everything, but no longer have any physical evidence tying me to them. Basically, I've outsourced the production and shipping. Making sure the people involved are ones that I trust to not mess up both in terms of quality and taking the right precautions to not get themselves caught. All from in real life, not random Reddit people (I never understood why people are so comfortable working with strangers they met online). I'm not even sure the parts I still handle myself are all that illegal. But I do my best to stay safe regardless".

TedDanzigSR posted on a public Reddit.com thread, labeled “Do any of you vendors hedge your bitcoins?” in February 2016.

“No, not really any way to buy a house with BTC and not be suspicious. Offshore banks might be used to hold them, but to spend them (in the US) from said account brings in all the AML laws, IRS stuff, etc. Especially for houses, as they keep a pretty good eye on those sales. Not saying it can’t be done, just not something I would do on account of me being paranoid”.

TedDanzigSR posted on a public Reddit.com thread, labeled “Buying things with resell money”. In February 2016:

“Well, if you got like zero taxable income, having a \$20,000 car might be a little suspicious. If you ever got audited, it would certainly show up as it’s all tied to your SSN. If that’s the only thing you have on record, it would probably be easy enough to explain. But if you 2 cars, a small boat, and some other nice things all registered in your name, I could see that being a problem. Still very unlikely, but my motto is if it doesn’t really cost anything to be extra cautious, do that.”

Further posted in the same thread:

“I haven’t bought much at all with the profit. Saving for retirement. If you took a look at my possessions, you would think lower middle class, at best (wife beaters all winter long). But I really don’t see it being a problem if someone wanted to. Just don’t funnel the money through any accounts in your name and there isn’t much to worry about (in terms of IRS, etc.) Something like a car I would probably put in someone else’s (whom I trust) name. But as long as it’s used, that’s probably not even needed”.

TedDanzigSR posted on a public Reddit.com thread, labeled “my TED came in today” In February 2016.

“My Packaging is deigned to not be suspicious to the USPS sorting facility. NOT to be good for hiding it from parents. I’m much more worried about the former than the latter. It’s a trade off. These vendors going balls out with stealth is good for them, but not the way I want to run my business. It’s domestic (no customs) so anything other than “normal” packaging is overkill and can actually cause more scrutiny. We do offer express with better “stealth” but we charge an arm and a leg for it (for a number of good reasons).”

TedDanzigSR started a public thread on Reddit.com, labeled “(TedDanzig) New State? (probably not) and Some Questions” in February 2016.”

TedDanzigSR posted the following:

“Thanks, very informative, No one really knows about it, but I used to make old MI using thin PVC. Worked fine, but that was before fakes were held to such high standards. If I went the teslin state route, I’d likely try to source regular (i.e. CR80) sized cards that mimic teslin (or even were teslin, ideally) so that I can use them in my PVC setup. We do apply a heat/ pressure treatment to them after holos are applied which mitigates creasing. But it is by no means perfect and no room for improvement using that method. True heat sealed is the only option, which I have not had any luck sourcing. Too paranoid to delve too deeply into it though. Thanks Again.”

Private Message on June 23, 2016 between vendors “TedDanzigSR” and “dDonJonfakes” having a conversation about the amount of people each employ’s.

TedDanzigSR replied the following:

“I only have 3 on the production side, but OH is a bit quicker not having to deal with perms etc. Runs really smooth. I keep them on a short leash, lol. Being international has it's advantages, but also a lot of headaches. Mostly with shipping issues. At this point I am about done trying to be innovative. I'll do UT an MAYBE another state down the line. But I won't be bringing any more people on board to expand or anything. I do hope to retire before too long. I've been saying it for a while, but I really think the first batch of UT will be ready soon. Once I get feedback I might reach out to you for buying/trading the front template. In the meantime, take care and have a fun summer!”

23. On June 1, 2016, Agent Hakeos conducted a trash pull at Mark Simon's residence, and retrieved two bags of trash from the street curb. Contained in the trash were items of mail, addressed to Mark Simon, listing the address of 4707 Stengel Ave., Toledo Ohio. Also in the trash was a sheet of printer paper that appeared to be testing the color scope of a printer. The paper contained numerous shades of the color spectrum.

24. On August 3, 2016, ODPS Agents conducted surveillance on Mark Simon's residence at 4707 Stengel Ave. Toledo, Ohio. Agents observed a black 1997 Honda Prelude, Plate number DN97AB parked in the driveway, registered to Mark Simon. During the Surveillance, Agents observed a brown Chevy Impala arrive, driven by a white female, later identified as Adrienne Armstrong. A short time later, the vehicle left. Later in the surveillance, a white Chevy van arrived at the residence (Temp Tag C992644). Agent observed a white male, later identified as Benjamin Stalets exit the vehicle and enter the residence. Approximately 40

minutes later, B. Stalets left the residence. The Temporary registration of the plate came back to Noelle Roerig with registered address of 6602 Brown Rd. Oregon, Ohio. Agent Moyers researched this address in OHLEG and observed that Benjamin Stalets and Nathan Powell also share the same address. Agent Moyers conducted on-line search for the subjects and ascertained that Benjamin Stalets was an aspiring county music artist playing at local bars in the Toledo area and abroad. Agents Moyers found an article in Toledo City Paper under the column "Doing better in Toledo: New Locals" where Noelle Roerig was spotlighted. The article states that N. Roerig moved from New York City where she worked in the restaurant industry back to Toledo to be a booking Agent for her fiancé Ben Stalets.

25. On November 22, 2016, at approximately 4:35 PM, Agent Moyers utilized a TOR browser and logged onto the website teddanzignblrntr.onion. Agent Moyers observed on the top right corner of the homepage it stated, "Current Price: \$210=0.2809 BTC". Agent Moyers clicked on the "ordering tab" and was directed to an ordering page. Agent Moyers selected to purchase one ID to be shipped Express USPS. Agent Moyers uploaded a zip file containing a picture of a confidential informant and a text file listing fictitious biographical information to be listed on the Identification. Agent Moyers listed the name of the confidential informant with the DOB: 06/04/1995. Agent Moyers designated the package to be shipped to a covert address at the University of Dayton. Agent Moyers clicked the submit button and was prompted to an "order status" screen and was given the confirmation number 9692443. Agent Moyers was requested to pay \$270 USD or 0.3611 Bitcoin to Bitcoin address 1FG8rkhehBAoKdgPs16sCu9LNU71pUfs8o. Agent Moyers logged into a Localbitcoin.com account and transferred 0.3611 bitcoins to the aforementioned BTC address and completed the transaction.

26. On November 23, 2016, Agent Moyers accessed teddanzignblrntr.onion and entered the order number 9692443 and checked the status of the purchase. Agent Moyers observed the purchase was marked “paid” and was being “processed.”

27. On November 29, 2016, at approximately 4:15 PM, Agent Moyers visited the University of Dayton mailroom and retrieved a USPS Express package containing the fake ID ordered. The package was described as USPS Priority Mail Express envelope with a return address of Toledo, Ohio. The return and shipping label was typed in black lettering. Payment for the shipping was made with a \$22.95 stamp.

28. On November 30, 2016, Agent Moyers signed over the package to Agent Dalton, who transported the package to BCI for latent print analysis. On December 1, 2016, Agent Hakeos conducted a trash pull at the Mark Simon’s residence and retrieved two trash bags from the street. Contained in the trash bags was US mail addressed to Mark Simon listing the address of 4707 Stengel Ave. Toledo, Ohio. Hakeos also recovered 5 blue latex gloves, an empty box that was labeled Favi Entertainment mini wireless keyboard touchpad and a Kroger receipt listing a purchase of 3 prepaid gift cards for the amount of \$50 each.

29. On January 13, 2017, at approximately 4:30PM, Agent Moyers utilized a TOR browser and logged into the website teddanzignblrntr.onion. Agent Moyers observed on the top right corner of the homepage it stated “Current Price: \$171=0.2076”. Agent Moyers selected the ordering tab at the home page. Agent Moyers clicked “proceed to checkout” link and was directed to a checkout page. Agent Moyers select “1” in the box labeled “How many you getting”. Beside the box, it stated “\$171 each (includes a duplicate)”. Under the box listed “production type” Agent Moyers selected “rush (+\$50)”. In the box listed “Shipping Type,” Agent Moyers selected “express (+\$50)”. Agent Moyers clicked on the “Browse” tab and

selected a pre-loaded zip file on the “D” Disk drive. The zip file included a picture of a confidential source and a text file with the bio graphics to be listed on the fictitious identification. Agent Moyers listed a fictitious name of the confidential source with a DOB of 4/7/1972. Agent Moyers clicked the “Submit” button and prompted to a “checkout” screen. The screen stated the following, “Order submitted successfully. Your Order ID is 2264046. Make sure to write your order number down somewhere safe! Its 7 digits long and can be stored in your phone as a contact, for example. Once you are sure you have your order number saved, click the button below to proceed”. Agent Moyers clicked the “Continue” button and was prompted to an “order status” page. This page states that payment is needed with Bitcoins and must be paid within the next 179 minutes. Payment details list the following; “Quantity: 1, Production Type: Rush, Shipping Type: express, Price (USD): \$221, Price (BTC): 0.2683, BTC Address: 13VUuzzWVEeF1RvKRKjoN42GbkRT4EazQb, Paid: 0, Due: 0.2683”. Agent Moyers logged into a Localbitcoin.com account and entered the above bitcoin address into “send bitcoins” box. Agent Moyers entered 0.2683 in the “Amount in Bitcoins” and clicked continue. Agent Moyers entered in a password to verify the transaction. Agent Moyers successfully completed the transaction. Agent Moyers returned to the Teddanzignblrntr.onion website. Agent Moyers clicked on “view/ open ticket” button and was prompted to a message window. Agent Moyers typed a message requesting an Ohio identification. Agent Moyers logged off the website.

30. On January 17, 2017, at approximately 9:55AM, Agent Moyers logged on to Teddanzignblrntr.onion to check the status of the order. Agent Moyers clicked on the “Order Status” tab and entered the order number 2264046. Agent Moyers observed the Order History as

follows: ordered: 2017-01-13 16:35:55, paid: 2017-01-13 19:20:03, processed: 2017-01-14 08:05:55, shipped: 2017-01-16 11:16:46.

31. On January 19, 2017, AAIC Michael Hakeos received a USPS Express mail package sent to a covert address. The package had a return address from Toledo, Ohio. Contained in the package were three fictitious Ohio driver's licenses.

32. On January 19, 2017, AAIC Hakeos obtained a trash bag from the Toledo Police Department that conducted a trash pull from Mark Simon's residence at 4707 Stengel Ave. Toledo, Ohio, the previous evening. Inside the trash bag was a receipt from Meijer. AAIC Hakeos contacted Meijer Loss Prevention and issued a Subpoena requesting information and video related to the purchase reflected on the receipt. Meijer supplied transaction information of the debit card that was utilized in the transaction of the receipt obtained from the trash pull. The Debit card used ended in 9814 and listed Benjamin Stalets as the cardholder. Meijer provided transaction information that card was used at this store four separate times from October 2016 to January 17, 2017. Meijer provided video of a transaction that occurred on January 7, 2017. Agents reviewed the video and recognized Mark Simon utilizing card # 9814 and purchasing grocery items from a check-out lane. After Simon completed his purchases, he approached the customer service counter and returned a sweater. Meijer requests a driver's license when a return occurs and they document the driver's license number. Simon provided his identification and Meijer recorded his DL# as SB366847. All transactions were video recorded and Meijer provided screen shots of the aforementioned dealings. Agent Moyers verified that the recorded DL number belongs to Mark Simon.

33. On February 8, 2017, AAIC Hakeos subpoenaed the provider of card # 9814, Net-Spend. Information from Net-Spend listed the account holder as Benjamin Stalets of 6602

Brown Rd. Oregon, Ohio 43616 account # 5960227054 with an Issued debit card ending in # 9814. Agents reviewed deposits into this account and observed every deposit was from Coinbase.com/BTC, a website that facilitates Bitcoin transactions.

34. On January 24, 2017, AAIC Hakeos and Agent Moyers learned that there was a Police Report from Toledo PD listing Mark Simon as a suspect. Agents met with TPD Detective Michael K. Talton who stated on August 30, 2014 TPD received an alarm dispatch at Fifth Third Bank at 3355 Secor Rd. Toledo, Ohio. Upon arriving, Officers located Mark Simon leaving the vicinity of an ATM at the bank. Officers questioned Simon, who stated he was getting money from the ATM for his roommate. Officers asked for a receipt of the transaction, at which time Simon became uncooperative and refused to answer any questions from Officers. During the encounter, a pat-down search was conducted of Simon and Officers retrieved six pre-paid debit cards in other people's names and \$1,680 in US Currency. Officers contacted a TPD Detective who advised the Officers to confiscate listed items and issue Simon a property receipt. TPD Officers submitted the six pre-paid debit cards and US currency into evidence and filed a police report. Agents were advised no further follow up was conducted by TPD on this incident.

35. AAIC Hakeos and Agent Moyers visited TPD Evidence facility and see if the six debit cards were retained in evidence, and learned the items were still in evidence. Agents signed a custody sheet and took possession of the debit cards. The cards are listed as below. 1) Green Dot Gold: Visa Debit card # 4720, Andrea Sauber. 2) NetSpend Visa Debit card # 1077, Dominick Kallil. 3) NetSpend Visa Debit card # 6088. 4) Ready Debit Platinum Visa card # 2225, Travic Wingo. 5) Ready Debit Platinum Visa card # 8969, William Seigfreid. 6) Ready Debit Platinum Visa card # 4141, Kevin Files.

36. On January 27, 2017, AAIC Hakeos issued subpoenas to all six debit card providers requesting account information. Agents received information back that all cards were loaded from various Bitcoin websites.

37. On February 7, 2017, Agents Moyers, Dalton, Shawver and AAIC Hakeos conducted surveillance on Mark Simon's residence from 5:00 PM TO 10:00 PM. Agents observed Mark Simon's Black Honda at the residence. Agents observed Simon's girlfriend, Adrienne Armstrong, arrive at the location and leave a short time later. During this time, Simon never left his residence.

38. On February 8, 2017, Agent Moyers spoke with Forensic Analyst Ashley Owens from BCI latent prints lab. Owens stated she was unable to lift any usable prints from the packaging or from the fictitious identification documents the Agents purchased from TedDanzigSR.

39. February 9, 2017, AAIC Hakeos conducted a trash pull at Mark Simon's residence at 4707 Stengel Ave. Toledo, Ohio. AAIC Hakeos retrieved one trash bag from the curb in front of the residence, which contained various utility bills addressed to Mark Simon at 4707 Stengel Ave. Toledo, Ohio, and a Kroger receipt from 2555 Glendale Ave. Toledo, Ohio. The receipt listed a debit card purchase with card ending in # 9814. Also located in the trash was a receipt from Best Buy located at 1405 Spring Meadows Dr. Holland, Ohio 43528, which listed the purchase of an Epson Expression ET-2550 ECOTA printer, which was purchased using a gift card. Agents previously had seen that on March 26, 2016, Teddanzigsr sent a private message to another fictitious identification manufacturer. Teddanzigsr referred specifically to utilizing an Epson Printer to load with a unique ink.

40. February 14, 2017, an Analyst Mason with OSHP Intel Unit located an Instagram account in the name of benstalets (Benjamin Stalets). A photo of a wallet was posted to the account four weeks prior. In the comments section it stated, “benstalets got a cool new-to-me wallet, to replace my haggard old wallet of 7+ years. Victories are often won in inches.” Agent Moyers reviewed the photo and observed a green dot debit card located in aforementioned wallet, and recalled that a pre-paid green dot card was retrieved from Simon when he was stopped in 2014 by TPD.

41. In February 2017, Teddanzigsr posted on Reddit.com public forum the following, “Taking a break from the 13th-23rd of this month.” Another Reddit user, Madisonstation, posted “Get a nice tan for us all Ted.” Ted replied back, “will do!” User IDViking posted, “If you see a guy on the Lido Deck on his 9th Bahama Mama don’t be a stranger!” Analyst Mason searched social media and found a post on Facebook by Mecca Keener on February 20, 2017, where Keener posted a photo of a large group of people at a dining table on what appears to be cruise ship. Among the people pictured in the photograph is Mark Simon and Adrienne Armstrong. A “Lido Deck” refers to outdoor pool area and related facilities on a cruise ship.

42. On March 22, 2017, OSHP installed a video surveillance recording device in a publicly accessible area directed at the front of Mark Simon’s residence at 4707 Stengel Ave. Toledo, Ohio. On March 25, 2017, Agent Moyers reviewed the video surveillance and observed a Black Jeep Grand Cherokee arrive at Mark Simon’s residence. A white female exited the vehicle and entered Simon’s residence. A short time later, she exited the residence carrying a package. M. Simon exited the residence carrying what appeared to be a printer. M. Simon loaded the item in the back of the Jeep Grand Cherokee. Agents ran the plate number GFW-

1092 from the Black Grand Cherokee and learned the registered owner was Sarah Alberts of 1015 Valley Bluff Dr. Perrysburg, Ohio.

43. On April 5, 2017, Agent Moyers reviewed video surveillance and observed Sarah Alberts arrive at Mark Simon's residence in Black Jeep Grand Cherokee. Alberts entered the residence and a short time later exited carrying a large white envelope and left. The envelope was similar to the type of envelope received by the Agents containing the fake identification cards ordered on-line. Also on April 5, 2017, AAIC Hakeos conducted a trash pull at 6602 Brown Rd. Oregon, Ohio. Hakeos retrieved one bag of trash from the road, which contained various pieces of U.S. Mail addressed to Nathan Powell with the listed address as 6602 Brown Rd.

44. On April 6, 2017, Agent Moyers reviewed video surveillance and observed Sarah Alberts arrive at Mark Simon's residence in Black Jeep Grand Cherokee. Alberts entered the residence and short time later exited carrying a package and left. According to the Agents, during the first part of April 2017, TedDanzigSR posted numerous public statements on Reddit.com that he was switching from manufacturing fictitious Ohio identifications to Michigan identifications. TedDanzigSR posted multiple posts about trial and error in perfecting the Michigan fictitious identification. He referred to different color schemes, material and equipment used to manufacture the identification.

45. On April 14, 2017, Analyst Mason was viewing the video surveillance and observed a 2008 Chevy Colorado, plate number FJC-8101 arrive at Simon's residence. A white male, later identified as Aaron Kuns, exited the vehicle and enter Simon's residence. A short time later, Simon exited the residence carrying a large white box approximately the size of a box of printer paper and placed it in the back seat of Kuns' four-door truck. Simon reentered his

house and retrieved a large cardboard box approximately the size of a large camping cooler and attempted to place it in the back seat of Kuns' truck. The item was too large to fit in the back seat, and after numerous attempts, Simon placed it in the bed of Kuns' truck. Simon entered his house, retrieved a roll of tape, and taped the top of the box to secure the item. Kuns left the property driving said vehicle.

46. April 27, 2017, AAIC Hakeos conducted a trash pull at Mark Simon's residence at 4707 Stengel Ave. Toledo, Ohio, and retrieved one trash bag from the curb in front of his residence. Inside the bag, was a Kroger receipt from 2555 Glendale Ave. Toledo, Ohio, which listed a debit card purchase with a card ending in # 9814.

47. On May 17, 2017, Agents received information from Buckeye Broadband, which showed that Aaron Kuns was the Internet account holder at 3749 Dewlawn Dr. Toledo, Ohio 43614. Their records also showed that Mark Simon was the Internet account holder at 4707 Stengel Ave. Toledo, Ohio 43614.

48. On May 27, 2017, AAIC Hakeos conducted a trash pull at the apartment complex of Sarah Albert at 1015 Valley Bluff Dr. Perrysburg, OH, and identified one trash bag that belonged to Alberts. In the trash bag were receipts, and a CVS Pharmacy prescription in the name of Sarah Alberts with a listed address of 1015 Valley Bluff Dr. Apt 1, Perrysburg, Ohio. Also in bag was a receipt from Provident Metals of Dallas, Texas, addressed to Sara Alberts at 1015 Valley Bluff Dr. Apt. 1, Perrysburg, Ohio, which listed the purchase of six Canadian gold coins for the total price of \$7,894.32. AAIC Hakeos later subpoenaed S. Alberts' transactions from Provident Metals and discovered that between September 5, 2015, and May 18, 2017, Alberts made twenty-one purchases, totaling \$124,539.98, for gold and silver coins. Bitcoin was used for all of the purchases.

49. June 2, 2017, AAIC Hakeos conducted a trash pull at Aaron Kuns' residence located at 3749 Dewlawn Dr. Toledo, Ohio, and retrieved one bag from the curb in front of the residence. Located in the trash bag was a receipt from AutoZone. The purchaser's name listed on the receipt was Aaron Kuns and reflected a MasterCard was used for the purchase with the last four of the card number of # 8705. There were also numerous empty boxes from Amazon.com addressed to Aaron Kuns at 3749 Delawn Dr. Toledo, Ohio 43614, and an empty US Priority Mail Express envelope. Agents examined the Express Mail envelope and noticed a small tear on the package. This type of envelope was the same as what Agents received from TedDanzigsr when purchasing fictitious identifications. Additionally, the bag also contained numerous black and blue latex gloves.

50. On June 2, 2017, AAIC Hakeos conducted a trash pull at Mark Simon's residence at 4707 Stengel Ave. Toledo, Ohio, and retrieved a trash bag from the street curb in front of Simon's residence. Located in the trash bag was an empty package from amazon.com addressed to Mark Simon at 4707 Stengel Ave. Toledo, Ohio 43614. Also located were numerous pieces of mail correspondence addressed to Mark Simon at 4707 Stengel Ave. Toledo, Ohio, including a bill from City of Toledo, Department of Utilities.

51. On June 15, 2017, AAIC Hakeos conducted a trash pull at Aaron Kuns' residence located at 3749 Dewlawn Dr. Toledo, Ohio, and retrieved two trash bags from the street curb in front of Kuns' house. Located in the trash bags was an empty box for Raspberry PI 2 and packaging from Vilros.com (computer equipment). Also found was an empty package from Amazon.com addressed to Aaron Kuns at 3749 Dewlawn Dr. Toledo, Ohio. Additionally, AAIC Hakeos found a label for a prescription from Walgreens issued to Aaron Kuns of 3749 Dewlawn Dr. Toledo, Ohio.

52. On June 23, 2017, Agent Moyers reviewed video surveillance and observed Sarah Alberts visit Mark Simon's residence, staying a brief time. Sarah Alberts exited the residence carrying what appeared to be a large manila envelope. S. Alberts departed in her Black Grand Cherokee, plate number GFW-1092.

53. On June 29, 2017, Agent Moyers reviewed video surveillance and observed Ben Stalets visit Mark Simon's residence, staying only a brief amount time. B. Stalets entered and exited the residence with nothing visible in his hands. B. Stalets was driving a 2008 white Chevy Van, plate number GXH-7384. The vehicle has joint ownership listed for Ben Stalets and his fiancé Noelle Roerig. The registration address listed with the Ohio BMV is 2211 Parkwood Ave APT 2S, Toledo, Ohio 43620.

54. On July 8, 2017, AAIC Hakeos conducted a trash pull at Aaron Kuns' residence located at 3749 Dewlawn Dr. Toledo, Ohio, and retrieved a few documents that were contained inside a trash can located on the street curb in front of Kuns's residence. The items located included a letter addressed to Aaron Kuns at 3749 Dewlawn Dr. Toledo, Ohio, from a vision care business, and two US Priority Mail Express envelopes that were ripped in half and included a post-it note with handwriting stating, "Out of exp. Env. And down to 1 stamp. I'll get \$ soon".

55. On July 24, 2017, Agent Moyers reviewed video surveillance and observed Sarah Alberts visit Mark Simon's residence, staying a brief period of time. Sarah Alberts exited her vehicle carrying a large manila envelope and entered Mark Simon's Residence. Alberts exited the residence a short time later carrying a smaller manila envelope, enter her black Grand Cherokee and left the area.

56. On August 2, 2017, at approximately 9:45 AM, Agents began surveillance at the residence of Sarah Alberts located at 1015 Valley Bluff Dr. Perrysburg, Ohio. Agents observed

her Black Grand Cherokee parked in front of the apartment complex. Agent Moyers was also monitoring video surveillance simultaneously on Mark Simon's residence. Agent Moyers observed M. Simon's vehicle at Simon's residence. At approximately 10:05 AM, Teddanzigsr posted on Reddit.com that his "queue" on his website was open. Agents concluded surveillance at 7:45 PM without observing S. Alberts leave or her vehicle move.

57. On August 2, 2017, Agent Moyers reviewed video surveillance and observed Ben Stalets visit Mark Simon's residence, staying only a brief amount time. Stalets entered and exited the residence with nothing visible in his hands. B. Stalets was driving a 2008 white Chevy Van, plate number GXH-7384.

58. On August 4, 2017, Agent Moyers reviewed video surveillance and observed Sarah Alberts visit Mark Simon's residence. Sarah Alberts exited her black grand Cherokee and entered the residence with nothing in hand. A short time later Alberts exited the residence carrying a square box, entered her Black Grand Cherokee and exited the area.

59. On August 18, 2017, Agents subpoenaed records from Amazon for purchases made by S. Alberts, M. Simon, Ben Stalets and A. Kuns.

Below are the items purchased made by Benjamin Stalets that was shipped to 6602 Brown Rd. Oregon, Ohio 43616.

February 5, 2016:

Fargo Ymcfk Full Color Ribbon / 500 Images for the HDP5000

HID Global Corporation Polyguard Laminating Roll 082608

Fargo Electronics Ultracard PVC High-Mag-High-Coerc Mag Stripe 500 Count

Fargo 084053 HDP Retransfer Film for HDP5000/ HDPii.

March 9, 2016:

2 pieces 11x9x8" Heavy Duty CR80 ID-1PVC Die Cutter (PF-CCR80) PVC
Business Card Die Round Corner Cutter Punch.

TLC 12-9/16" Pouch Laminator

**Below are the items purchased made by Sarah Alberts that was shipped to 1015
Valley Bluff Dr. Apt. 1 Perrysburg, Ohio 43551.**

August 15, 2015:

Nitrile Examination Powder Free Gloves (Medical), Blue, Box of 100 (Latex
Free) (CE, FDA) (Maximum Protection) M

March 27, 2017:

Logitech MK2700 Wireless Keyboard/ Mouse Combo, Logitech Wireless Mouse
USB.

June 29, 2017:

ScanDisk Cruiser CZ36 64GB USB 2.0 Flash Drive

**Below are the items purchased made by Aaron Kuns that was shipped to 3749
Dewlawn Dr. Toledo, Ohio 43614.**

October 14, 2014:

Hid Fargo hdp5000 Dual Side base Model 89003

Fargo 084053 HDP Retransfer film for HDP5000/ HDPii

Fargo Ymcfk Full Color Ribbon/ 500 images for the HDP5000,

Fargo Electronics Ultracard PVC High-Mag High-Coerc Mag Stripe 500 Count

Fargo Cleaning kit for the HDP5000

October 27, 2014:

PowerPress Industrial-Quality Digital 15-by-15-Inch Sublimation T-Shirt Heat Press Black

Fargo Ymcfk Full Color Ribbon /500 Images for the HDP5000

Fargo ISO Magnetic Stripe Encoding Module- Printer Magnetic Stripe encoder

New-86412- Asure ID Express 7- 4820872. (ID making software)

September 16, 2016:

Adenna Night Angel 4 Mil Nitrile Powder Free Exam Gloves (Black, Medium)

November 29, 2016:

(Second Box) Adenna Night Angel 4 Mil Nitrile Powder Free Exam Gloves
(Black, Medium)

March 10, 2017:

Office World Replacement for Epson 127 Black Extra High Yield Ink Cartridges
Compatible with Epson WorkFORCE 845 545 645 840 630 wf-3540 WF-3520
WF-75

April 25, 2017

Baseball Card Collector Box with Over 500 Cards

Many of these items purchased from Amazon are items that are used to manufacture, produce and/or ship fictitious identification documents. According to the Agents, Teddanzigsr on Reddit.com referred multiple times to many of the terms or items listed above, such as PVC, CR-80, Epson, etc.

60. On September 15, 2017, Agent Moyers reviewed video surveillance and observed Ben Stalets visit Mark Simon's Residence, staying only a brief amount time. Stalets entered the

residence carrying a small box. Stalets was driving a 2008 white Chevy Van, plate number GXH-7384.

61. September 18, 2017, Agent Moyers reviewed video surveillance and observed Sarah Alberts visit Mark Simon's residence. Alberts entered the residence carrying only a small purse. A brief time later, Alberts exited the residence carrying a large manila envelope. Mark Simon also exited his residence carrying a small cardboard box and placed it in the hatchback area of Alberts' Jeep Grand Cherokee, before Alberts exited the area.

62. On December 12, 15, and 19, 2017, Agent Moyers reviewed video surveillance and observed Ben Stalets visit Mark Simon's Residence, staying only a brief amount of time. Stalets entered and exited the residence with nothing visible in his hands. Stalets was driving a 2008 white Chevy Van, plate number GXH-7384.

63. On January 9, 2018, Agents subpoenaed PNC Bank for financial records reference Noelle E Roerig, the live-in fiancé of Ben Stalets. The bank records show that Roerig has an open account with an address listed as 2211 Parkwood Ave Apt 2S. Toledo, Ohio 43620. Agents previously identified this address as the current address for Ben Stalets.

64. On January 16, 2018, AAIC Hakeos attempted to conduct a trash pull at the residence of Ben Stalets, however no trash was present in front of the residence. AAIC Hakeos did observed the white Chevy van, plate # GXH7384 registered to Ben Stalets parked on the street in front of the residence. On January 18, 2018, AAIC conducted a trash pull at Aaron Kuns' residence 3749 Dewlawn Ave. Toledo, Ohio and observed his registered vehicle, 2008 Chevy Colorado in the driveway.

65. On January 24, 2018, Agents received information from Provident Metals which reflected that Sarah Alberts purchased six, 1 oz. Canadian Gold Maple Leaf for \$7,877.22 on

June 17, 2017, paying for the order using Bitcoins. The shipping and billing address was listed as 1015 Valley Bluff Dr. Apt 1. Perrysburg, Ohio 43551.

66. On January 30, 2018, AAIC Hakeos attempted to conduct a trash pull at the residence of Ben Stalets, however, no trash was present at the residence. AAIC Hakeos did observe a white Chevy van that is registered to Ben Stalets parked in front of Stalets residence.

67. On February 1, 2018, Agent Moyers ran Ben Stalets License Plate Number GXH-7348 through a Law Enforcement database. The address listed on the registration was 2211 Parkwood Ave. APT 2S Toledo, Ohio 43620. On February 1, 2018, at approximately 10:20 AM, AAIC Hakeos and Agent Moyers conducted surveillance at the residence of Ben Stalets located at 2211 Parkwood Ave. APT 2S Toledo, Ohio. Agents observed Stalets' Chevy van parked on the street in front of his apartment. While Agent were locating a place to conduct surveillance the van exited the area and Agent lost visual contact. Agents had previous information that Stalets fiancé worked at Manhattan's restaurant located at 1516 Adams St. Toledo, Ohio. Agents traveled to Manhattan's restaurant at 10:35 a.m. and observed Stalets' van parked on the street in front of the restaurant. A short time later, Agents entered the restaurant taking the role of Patrons. Upon entering, Agents observed Ben Stalets working behind the bar and his fiancée working in the kitchen.

68. On February 6, 2018, Agents from ODPS, assisted by agents from the United States Secret Service, executed State of Ohio search warrants at the following locations: 4707 Stengel Avenue, Toledo, Ohio 43614 (Mark Simon's residence); 1015 Valley Bluff Drove, Apt. 1, Perrysburg, Ohio, 43551 (Sarah Alberts' residence); 3749 Dewlawn Drive, Toledo, Ohio 43614 (Kuns' residence); 2211 Parkside Avenue, Apt. 2S, Toledo, Ohio 43620 (Stalets' residence); and for Simon', Kuns' and Stalets' vehicles.

69. Agents attempted to interview the various individuals. Simon invoked his right to counsel and declined to be interviewed. Kuns consented to be interviewed and stated as follows. Approximately a year and a half ago, Alberts approached Kuns and discussed him getting involved with the production of counterfeit IDs, and indicating that he would be paid in Bitcoin or gold. According to Kuns, Simon ordered all of the necessary equipment and helped set up the equipment at Kuns' residence. According to Kuns, Simon received orders for the fake IDs and would send the photos, personal information and mailing labels to Kuns for processing using encrypted files. Kuns would then access a TOR site to access and view the files. Kuns would make the IDs, and package them for delivery. Kuns placed the packages in his garage, and sent text messages to Alberts indicating the orders were ready for pick up. Alberts would then access the garage using a known passcode for the door opener, and would take the package to be mailed. Simon always did the ordering of supplies and equipment, and would have it shipped to Kuns' residence. Simon paid Kuns in Bitcoin, but Alberts paid him in gold coins or gold bars. Kuns stated that he had not been paid in over a month.

70. During the search of Simon's residence, 4707 Stengel Ave., Toledo, Ohio, investigators seized, among other items, the following:

- a. 18 gold coins;
- b. 215 silver coins;
- c. 21 gold and silver bars;
- d. \$7,000 in U.S. Currency;
- e. Numerous USB storage devices;
- f. Documents related to purchase of gold;
- g. Six identification cards not issued in Simon's name;

- h. White heat shields;
- i. Asus computer;
- j. Dell computer;
- k. Gift card receipts;
- l. Numerous external hard drives;
- m. Epson Gloss photo paper;
- n. Rubber/latex gloves;
- o. Two black lights;
- p. Six cellular phones;
- q. Six modems;
- r. Bitcoin receipt;
- s. Photo printer;
- t. 20 printer plates;
- u. Approximately \$4.7 million in bitcoin, taken from approximately 30 wallets stored on a USB thumb drive.

Based on the foregoing, Affiant respectfully submits that there is probable cause that MARK SIMON has committed the following federal criminal offenses:

- A. Knowingly and without lawful authority, producing one or more identification documents, authentication features and false identification documents in violation of Title 18, U.S.C., Section 1028(a)(1);
- B. Knowingly transferring one or more identification documents, authentication features and false identification documents knowing that such document or


feature was stolen or produced without lawful authority, in violation of Title 18, U.S.C., Section 1028(a)(2); and

- C. Knowingly produce, transfer and possess a document-making implement and authentication feature with the intent such document-making implement and authentication feature will be used in the production of a false identification document or another document-making implement and authentication feature which will be so used, in violation of Title 18, U.S.C., Section 1028(a)(5).



Steven Snyder
Special Agent
United States Secret Service

Sworn before me this 8th day of February, 2018.



JAMES R. KNEPP, II
United States Magistrate Judge